TABLE 1. VOHAP LIMITS FOR MARINE COATINGS							
	Grams/liter coating (minus water	Grams/liter solids (solids = nonvolatiles)					
Coating category	and exempt compounds)	t\$4.5 EC	t < 4.5 ^a EC				
General use	340	571	728				
Specialty:							
Air flask	340	571	728				
Antenna	530	1,439					
Antifoulant	400	765	971				
Heat resistant	420	841	1,069				
High-gloss	420	841	1,069				
High- temperature	500	1,237	1,597				
Inorganic zinc high-build	340	571	728				
Military exterior	340	571	728				
Mist	610	2,235					
Navigational aids	550	1,597					
Nonskid	340	571	728				
Nuclear	420	841	1,069				
Organic zinc	360	630	802				
Pretreatment							

	All Options Option		on 1	Option 2		Option 3		
Requirement	Rec	Rep	Rec	Rep	Rec	Rep	Rec	Rep
Initial Notification (§ 63.9(a)-(d)	Т	Т						
Implementation plan (§ 63.787(b))	т	Т						
Volume of coating applied at unaffected major sources (§ 63.781(b))	Т							
Volume of each low-usage-exempt coating applied at affected sources (§ 63.781(c))	т	т						
ID of the coatings used, their appropriate coating categories, and the applicable VOHAP limit	т	т						
Determination of whether containers meet the standards described in § 63.783(b)(2)	т	т						
Results of M-24 or other approved tests	т	т						
Certification of the as-supplied VOC or VOHAP content of each batch	т							

TABLE 2. SUMMARY OF RECORDKEEPING AND REPORTING REQUIREMENTS

switching to lower VOC/VOHAP coatings. There are many other *pollution prevention* options for the

625/7-91/015) in October 1991. Some of the documented options include the use of reformulated coatings and/or solvents with lower or no HAP materials, and recycling of solvent waste from painting and cleaning activities. There are work practice standar

using lower VOHAP/VOC paints; some facilities may adopt add-on controls. EPA's accompanying guidebook provides more detailed information on the cost impacts associated with the regulation.

< WHAT POLLUTION PREVENTION OPTIONS EXIST?

The entire regulation is based on *pollution prevention* with the marine coating limits based on

shipbuilding and ship repair industry. The EPA published "Guides to Pollution Prevention--The Marine Maintenance and Repair Industry" (EPA/

approximately \$58,000/yr to comply with the regulation. Most shipyards are expected to comply

http://ttnwww.rtpnc.epa.gov. Assistance with the TTN is available by calling (919) 541-5384.

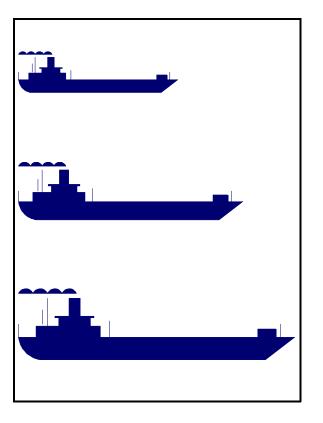
January 1997
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EPA 453/F-97-001

Office of Air Quality Planning & Standards (MD-13)

The EPA is divided into 10 geographic regions. You may also call the Regional Office for your State or territory for more information about this regulation.

New Regulation Controlling Air Emissions from Shipbuilding and Ship Repair Surface Coating Operations

EPA



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